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IDAHO PUBLIC UTILITIES COMMISSION

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF ROCKY MOUNTAIN POWER TO CLOSE) CASE NO. PAC-E-19-08
THE NET METERING PROGRAM TO NEW)
SERVICE & IMPLEMENT A NET BILLING) COMMENTS OF THE
PROGRAM TO COMPENSATE CUSTOMERS) COMMISSION STAFF
GENERATORS FOR EXPORTED ENERGY)

STAFF OF the Idaho Public Utilities Commission, by and through its Attorney of record, Edward Jewell, Deputy Attorney General, submits the following comments.

BACKGROUND

On June 14, 2019, Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “Company”) filed an application requesting the Commission close Electric Service Schedule 135 – Net Metering Service (“Schedule 135” or “Net Metering Program”) to new customer participation as of December 31, 2019, and open Electric Service Schedule 136 – Net Billing Service (“Schedule 136” or “Net Billing Program”) to new customer participation as of February 1, 2020.

On July 18, 2019, the Commission issued a Notice of Application and Notice of Intervention Deadline. Order No. 34379. Idaho Irrigation Pumpers Association, Inc., Idaho Conservation League, and Idaho Clean Energy Association, Inc. intervened.

On December 20, 2019, the Commission issued a final order in IPC-E-18-15 rejecting a proposed Settlement Agreement for Idaho Power’s net metering program. Order No. 34509.

On February 5, 2020, the Commission issued a final order on reconsideration in IPC-E-18-15 upholding its decision to reject the proposed Settlement Agreement. Order No. 34546.

On March 10, 2020, the Parties met to discuss how to proceed with Rocky Mountain Power's Application in light of the Commission's directives in Order Nos. 34509 and 34546 issued in IPC-E-18-15.

On April 23, 2020, Rocky Mountain Power submitted a supplemental application ("Supplemental Application") with updated inputs to the proposed export credit rate and an updated proposal regarding grandfathering treatment for existing customers.

On April 28, 2020, Commission Staff presented a Decision Memorandum at the Commission's regularly scheduled Decision Meeting outlining the proposed procedure and schedule agreed to by the parties.

On May 6, 2020, the Commission issued Order No. 34661 which adopted the "two-phase" approach the Commission ordered for Idaho Power in Order No. 34509 and recommended by parties in this case. The two-phase approach consists of a study design phase and a study review phase, with opportunities for public input during both phases. The study design phase provides the parties and the public the opportunity to comment on the scope and parameters of the study. Following the study design phase, the Commission will issue an order establishing the scope and parameters of the study. The Company then will conduct the study and file it with the Commission. After the Company files the study, the Commission will issue an order establishing the procedure and schedule for the study review phase. The study review phase will allow parties and the public to state whether the study was conducted in a credible and fair manner and whether the study is sufficiently comprehensive to support a well-informed decision regarding Rocky Mountain Power's net metering service offerings.

Rocky Mountain Power submitted a Supplemental Application in this docket, which supersedes the Company's original application.

The Company proposes to close its current Net Metering Program to new participants as of July 31, 2020. The Company proposes that Schedule 135 customers remain on Schedule 135 until July 31, 2030, grandfathering existing customers to the terms of Schedule 135 for ten years.

Arguments pertaining to the Company's proposed grandfathering treatment for existing customers will be considered in the study design phase.

The Company requests the Commission establish Schedule 136 – Net Billing Program effective September 1, 2020. The Company proposes that customers who apply to interconnect an onsite generation system after July 31, 2020 take service under Schedule 136.

The Company states the only difference between its current Schedule 135 and its proposed Schedule 136 is that under Schedule 136, energy exported to the grid by a customer generator would be compensated at an export credit rate (“Export Credit Rate”).

The Company requests the Commission open Schedule 136 for new customers as of September 1, 2020, but initially set the Export Credit Rate equivalent to retail energy charges until the Commission approves an Export Credit Rate.

The Company proposes three components to determine the Export Credit Rate: an energy component, an avoided line losses component, and an integration cost component.

The Company proposes using the Surrogate Avoided Resource (“SAR”) method, with on-peak and off-peak pricing, to determine the energy value in the Export Credit Rate. The SAR method is used by the Commission to calculate published avoided cost prices under the Public Utility Regulatory Policies Act of 1978. The SAR method reflects the costs the utility would incur if it were to build, operate, and maintain a natural gas fired combined cycle combustion turbine. Based on 2019 data and the proposed SAR rates set to take effect on June 1, 2020, the Company calculates the average value of the SAR-based energy component at \$22.34 per MWh.

For the value of avoided line losses, the Company proposes a value of \$3.36 per MWh.

The Company states it must maintain reserve resources to integrate variable resources. The Company calculates its integration costs, based on its 2019 Integrated Resource Plan, as \$0.25 per MWh.

The Company and Commission Staff have committed to holding public workshops after preliminary comments are filed and before revised comments are filed. The Company states it will notify all customers when the times, dates, and locations of the workshops are finalized. Due to COVID-19, these public workshops will include a telephonic option.

The Company proposes to recover exported energy credits for Schedule 135 and Schedule 136 through the Company’s Energy Cost Adjustment Mechanism (“ECAM”).

The Company reports about 1,262 customers with a total of 9.3 megawatts installed capacity participate under Schedule 135 as of the end of March 2020.

The Company proposes a one-time non-refundable application fee of \$85 be submitted with the customer's application for on-site generation.

The Company proposes no changes to retail consumption rates in this docket. On March 26, 2020, Rocky Mountain Power filed a Notice of Intent to File a General Rate case. In its Supplemental Application, the Company states it intends to file a general rate case on June 1, 2020. Rate design and cost of service issues for consumption will be addressed in that docket.

STAFF ANALYSIS

Staff's preliminary comments in this matter recommend that the Commission order the Company to study the components of its net metering program described in more detail below. However, Staff looks forward to soliciting and incorporating feedback from the public on each of these items and adjusting these recommendations based on that input where appropriate.

Grandfathering Existing Net Metering Customers

The Company proposes to grandfather existing net metering customers on Schedule 135 for 10 years beginning on July 31, 2020. In contrast, Staff recommends that existing net metering customers be grandfathered for 25 years from the date of the relevant Commission order at the project location. Staff believes that the logic and conclusions reached by the Commission in Order Nos. 34509 and 34546 apply as much to Rocky Mountain Power customers as they did to Idaho Power net metering customers and should therefore be adopted in this case. Rocky Mountain customers likely had an expectation that the essential program structure under which they were installing net metering equipment would remain intact, though rates for consumption and bill credit could change.

Staff believes a 25-year grandfathering period is fair to existing net metering customers because it acknowledges the significant investment many customers made to meet their energy needs and it is also fair to other customers because the financial impact to them will likely be small. Staff believes the Commission should order the Company to quantify the dollar amount expected to be recovered from all non-net metering customers under a reasonable range of export credits and grandfathering time periods. The Company should also prepare appropriate schedules showing class allocations and comparing each option to revenues for all rate schedules

In its original Application, the Company proposed an alternative to its 10-year grandfathering proposal. In that alternative, the Company proposed that no net metering customers would be grandfathered, but that all net metering customers (existing and new) would move from the current retail rate compensation to the Export Credit Rate compensation over three years. Staff does not believe that grandfathering existing customers is necessarily mutually exclusive with a transition period for new customers. Because a future Export Credit Rate could be significantly different from the retail rate, it could be reasonable to adopt both policies to limit disruption and facilitate an orderly phase-in of the new program structure. The Company should be required to evaluate phase-in options, calculate the dollar amounts expected to be recovered under each phase-in period studied, and show class allocations with a comparison to revenues for all rate schedules.

Application Fee

The Company proposes implementing an \$85 application fee for customers requesting service under Schedule 135 and 136. The goal of an application fee is to ensure that the costs the Company incurs to process an application for net metering customers are not absorbed by other customers. To study the proposed application fee, Staff recommends that the Company provide the costs the Company has incurred in processing applications for these customers historically and then calculate an average rate per application. Staff proposes to study this fee by auditing those costs and the calculation to verify the application fee is accurate. The Company's proposed fee is less than the \$100 other utilities charge for this service. The audit process to verify the fee is relatively straightforward.

Recovering Export Credit Rates in the ECAM

The Company proposes to recover the Export Credit Rate paid to net metering customers (both Schedule 135 receiving the retail rate and Schedule 136 receiving an Export Credit Rate) through the ECAM, which is an annual rate adjustment through which the Company recovers power supply costs. Staff notes that the method the Company uses to recover these expenses can have a significant effect on which customer classes pay these costs.

In order to study the Company's ECAM proposal, Staff recommends the Company explain the method it currently uses to record net metering bill credit costs, the amount of these costs, and how these costs would change depending on a range of possible Export Credit Rates

that may be approved by the Commission. The Company should then analyze how these costs have been allocated and recovered between rate classes historically and how they would be allocated and recovered through the proposed ECAM method.

Export Credit Rate

The Company's Supplemental Application proposes an Export Credit Rate of \$22.34 per MWh for energy generated to the grid by Schedule 136 net metering customers. The proposed Export Credit Rate includes three components: 1) avoided energy costs, 2) avoided line losses, and 3) integration costs. While Staff believes these are reasonable components of an Export Credit Rate, Staff has concerns about the data and methods the Company used to calculate these values. In addition, Staff also believes that the Company should study the avoided capacity costs, avoided transmission and distribution costs, and avoided environmental costs provided by net metering exported energy to determine if these values should be included in the Export Credit Rate.

Modeled Data as a Proxy for Actual Customer Export Data

Staff recommends that the components of the Export Credit Rate be analyzed using modeled customer export data until at least one year of customer-generator Advanced Metering Infrastructure ("AMI") data becomes available. Although Staff believes that it is preferable to conduct this analysis using actual customer export data, sufficient data will not be available for at least one year after the Company has deployed AMI meters to its Idaho customer-generators. Given the Company's current implementation plan, Staff does not anticipate that AMI meter data will be available for at least two years. Hourly export data, or a modeled proxy of it, will be needed to:

- Evaluate the Company's proposal to use time-differentiated Export Credit Rate prices.
- Evaluate whether or not it is appropriate to include a capacity credit in the customer-generators' export credit rate, and if it is appropriate to determine the value of that credit.
- Determine the financial impacts that proposed compensation structures would have to differently situated customer-generators.

In order to serve as a satisfactory proxy for AMI data, the data will need to provide accurate hourly estimates of each customer's imports and exports. There should also be some method for checking the accuracy of the model.

In its response to Staff's Production Request No. 21, the Company provided modeled hourly import and export data for each of its Idaho solar customer-generators. The Company modeled each customer's hourly generation using a widely available solar modeling tool (PV Watts). The Company then scaled a generic, average household consumption profile so that modeled monthly imports or exports were equal to the actual monthly billing data for each customer. The modeled hourly estimates of energy imports and exports can then be used as a proxy for hourly AMI meter data. Because each customer-generator model is constrained to match actual net monthly billing data, Staff will be able to estimate an upper limit on the error that might exist between modeled energy exports and actual energy exports. For the customer-generator class, it is likely that the deviation between modeled energy imports/exports and actual energy imports/exports will be relatively small, and less than the typical annual variation in exported energy. Because the deviation is likely to be small, Staff believes using modeled data to determine the value of exported energy is reasonable.

However, Staff is less certain about the model's ability to provide proxy data that can be used to estimate exports during system peaking events. This means that modeled data might not be sufficient for calculating the capacity value of net metering customers' exported energy. This calculation is particularly sensitive to assumptions about panel orientation, the amount of power being consumed by each customer-generator during system peaking events, and the exact time that system peak occurs. Company records include the name-plate capacity of each customer-generator's system, but not information about solar panel orientation. The Company model assumes that all panels face southward. Staff performed a sensitivity analysis, and found that there is little difference in the peak production of panels with a true south orientation and those oriented within about 20 degrees of true south; however, panels with a large westerly orientation can contribute substantially more at system peak than those with a true south orientation. Because total annual energy production is maximized by orienting panels due-south, it is not unreasonable to assume that the panels of most customer-generators have a southerly orientation; however, Staff is unable to confirm that this is actually the case.

The Company used Idaho Falls weather data to model all of its Idaho customer-generators. Staff explains that relevant weather and solar radiation data for Idaho Falls is more complete than for other cities in the Company's Idaho service territory because Idaho Falls is used as a grid point in the National Solar Radiation Database. Staff believes it likely that Idaho Falls weather is reasonably indicative of the weather in other parts of the Company's Idaho service territory during summer peaking events.

Because summer peaking events typically occur during the late afternoon, when the solar radiation incident on south-facing solar panels is changing rapidly, the Company's estimates of any individual solar generator's contribution to system peak are extremely sensitive to assumptions about the exact amount of power being consumed on-site at the time of system peak. It is likely that any individual customer's consumption will deviate significantly from the average consumption profile used in the Company's model, therefore, Staff cannot confirm the accuracy of the model's exports at system peak. Furthermore, given the available information, it will be difficult for Staff to determine a meaningful upper limit on the error that could result in modeled estimates of capacity value.

In summary, it is not possible to provide a thorough quantitative analysis of the Company's proposed Export Credit Rate without accurate, hourly, customer export data. It will be at least two years before sufficient data from AMI meters becomes available, so Staff believes it is reasonable to use modeled data as a proxy in the meantime. Staff believes the model provided by the Company to be as accurate as possible given the available data, and that energy credits calculated using this model will be reasonably accurate; however, Staff is less certain that capacity credits calculated using modeled data will be as accurate. Staff believes that the model is sufficiently accurate for the current case; however, Staff believes that the energy and capacity values obtained from the model should be updated as soon as AMI data becomes available. Because the modeled data mimics the data that will be obtained from AMI meters, Staff believes that it should be possible to perform this update using the same methodologies used to derive energy and capacity values from modeled data.

Avoided Energy Value

The Company proposes to calculate the value of avoided energy for the Export Credit Rate using the Commission's SAR method adjusted for on-peak and off-peak pricing. Although

Staff believes it reasonable to calculate the energy values according to on-peak and off-peak pricing, Staff believes that the SAR method is problematic because its energy price assumptions do not align with the energy price assumptions used in the Company's IRP. The SAR method uses the U.S. Energy Information Administration ("EIA") mountain sector energy price forecast rather than the energy price forecast used in the Company's IRP. Because the energy price assumptions for the proposed Exported Credit Rate do not relate to the Company's IRP, they are not likely to be a reasonable assessment of the costs the Company will avoid. Staff recommends that the Company analyze the value of its net metering customers' exported energy using the price assumptions in its most recently acknowledged IRP.

Staff also notes that the Company's proposed method for valuing avoided energy only includes 85% of the energy price forecast. The Company maintains that this downward adjustment is appropriate because net metering exported energy is a non-firm resource. However, the Company did not provide any analysis, workpapers, sources, or supporting documentation demonstrating how this value was calculated. Staff recommends that the Company provide these calculations and sources so they can be analyzed by Staff, stakeholders, and the public.

Avoided Capacity Value

The Company's proposed Export Credit Rate does not include a capacity value, nor does it include a method for studying the capacity value of energy exported to the Company's system from net metering customers. Staff recommends that the Company study the capacity value that customer-generators, as a class, provide to the system. The Loss of Load Probability (LOLP) methodology is a standard method for estimating capacity value, but a complete LOLP study requires considerable time and it can be costly.

Although Staff would not object to a LOLP study, Staff believes that the capacity value of customer-generated exports can be determined using the power that is reliably exported to the Company during peaking events. Staff recommends using a reliability threshold of 99.5%. If, for example, the analysis determines that customer-generators provide no less than 1.5 MW of power during 99.5% of the peaking events, then Staff would recommend using 1.5 MW as the basis for determining the capacity avoided by the customer-generator class. Staff believes that

an accurate estimate of the power reliably exported during peaking events can be obtained using the top 100 peaking events from each of the past 10 years (1,000 peaking events).

In summary, Staff recommends that the Company formally study capacity value, either using the Loss of Load Probability method, or using the method described by Staff.

Avoided Line Losses

Staff has reviewed the Company's proposed methodology and calculations to determine the value of avoided line losses and believes it is reasonable. Staff believes these sources and calculations should be included in the Company's study but does not recommend any changes thus far.

Integration Costs

Staff believes that the integration study used by the Company was inappropriate for determining the integration costs of net metering exported energy, and recommends that integration charges be set at zero until the Company develops a methodology that is suitable for net metering exported energy.

Integration costs are the costs of managing and maintaining adequate reserves to compensate for unpredictable fluctuations in the output of generation resources. The Company only collects monthly netted consumption and production data for its net metering customers; because it does not have actual export data for these customers, it is not possible to conduct an integration study for this class.

Because the Company does not have exported energy data for its net metering customers, the Company used values from the Flexible Reserve Studies ("FRS") performed as part of its annual IRP, which is conducted to determine the integration costs of energy supplied by commercial wind and solar farms. Staff notes that commercial solar and wind farms generate directly into the grid, and that any fluctuations in power must be managed immediately. Net metering customers, however, consume some or all of the energy they produce on-site to offset their own energy requirements, so Staff expects their generation profile to differ substantially from that of commercial wind and solar generators, and is therefore not a reasonable proxy. Whether the generation profile of net metering customers is more stable or less stable than that of

commercial generators cannot be known without actually looking at the actual energy exports over short time scales, such as five minutes, fifteen minutes, or one hour.

However, the instability of the Company's proposed integration methodology is evident in the 60 percent difference between integration charges proposed in the Company's original Application and its Supplemental Application. In its original application, the Company proposed a \$0.64/MWh integration charge based on the results of the FRS performed as part of its 2017 IRP. Using the FRS from the Company's 2019 IRP, the Company proposed a much lower integration charge of \$0.25/MWh. Staff believes this dramatic swing shows that the model is not stable enough to use for net metering purposes.

Staff does not believe that an adequate integration study can be conducted until the Company has actual energy export data from its net metering customers. Therefore, Staff recommends that the Company wait to study the integration charge for net metering customers until the AMI data becomes available, and in the meantime use a zero placeholder.

Avoided Transmission and Distribution Costs

The Company's proposed Export Credit Rate does not include a value for transmission and distribution costs that could be avoided by the energy exported to the grid by net metering customers. Staff recommends that the Company study the costs of transmission and distribution that can be avoided by energy exported to the grid by its net metering customers.

Avoided Environmental Costs

The Company's proposed Export Credit Rate does not include a value for environmental costs that could be avoided by the energy exported to the grid by net metering customers. Staff understands that most, if not all, avoided environmental costs included in rates would be included in the energy costs. However, Staff believes that it is reasonable for the Company to study any additional avoided costs and benefits not already in rates, including but not limited to the possible value of Renewable Energy Credit sales. Staff looks forward to customer input on this issue.

Schedule 136 Implementation Issues

The Company's proposal includes several aspects related to how it intends to implement Schedule 136 if approved by the Commission. While not all of these aspects can be quantitatively studied, Staff believes it is useful to discuss these aspects in detail.

Billing Structure

The Company's original Application proposes that exported energy be measured instantaneously, which would eliminate the need for netting customer generation with customer consumption. However, this will not be possible until the Company installs AMI meters. Staff recommends that the Company more fully explain how it proposes to bill customers until AMI is implemented throughout its Idaho service territory. Staff also recommends that the Company explain how the seasonal and time-of-delivery price differences help align customer generated exported energy with the Company's system needs.

Export Credit Expiration

The Company proposes that Export Credit Rates generated by customers expire annually. Staff is concerned that the annual expiration of energy credits may unduly deprive customers of the significant value generated by their net metering investments. Staff believes that this issue should be studied to determine the appropriate time frame for credits to expire, if any.

Staff believes that a customer generation system designed to primarily offset consumption rather than produce exported energy may produce a significantly different amount of energy from year-to-year based on changes in weather and consumption. For example, if the customer produces a significant amount of export credits in a sunny year, the customer may not be able to use all of those credits if the subsequent winter is relatively warm. This could penalize customers for normal variations in weather that are outside their control.

Staff recommends that the Company provide evidence showing the magnitude, duration, and value of accumulated export credits so that parties can recommend a reasonable approach to studying this issue, which should include analyzing a range of longer expiration periods. Additionally, the Company should explain the need for credits to expire and show how it does or does not benefit from the expiration of customer export credits.

Frequency of Export Credit Rate Updates

The Company proposes to update the Export Credit Rate paid to customers annually. While Staff agrees that more frequent updates more closely track avoided costs, Staff also understands that such frequent updates make it more difficult for current net metering customers to estimate their bills and more difficult for solar installers to provide accurate estimates to prospective net metering customers analyzing a significant investment. Staff believes that participating customers' need for stability should be balanced with the need for regular updates to accurately track avoided costs.

Staff recommends that the Company study the impact of biannual updates as compared to annual updates to determine if that would strike a fair balance between the two interests.

Smart Inverter Study

Customer-owned and utility-operated smart inverters provide grid benefits and power quality services that allow the Company to more effectively integrate customer-generated energy into the grid and provide ancillary benefits, including reactive power control. The Company has researched and developed a smart inverter policy and rates for its Utah customers, so Staff recommends that the Company analyze the benefits of applying that policy in its Idaho service territory.

In 2017 Rocky Mountain Power took part in a Smart Inverter Project as part of the Utah Sustainable Transportation and Energy Plan (STEP, SB115 54-20-105-1(h)) to investigate the capabilities and impacts of smart inverters on the Company's distribution system. Utah Public Service Commission Docket No. 16-035-36. The Company's project partners included the Electric Power Research Institute and Utah State University, and resulted in the study of: (1) IEEE 1547 smart inverter standards and policy, (2) laboratory selection and testing, (3) hosting capacity results, with and without smart inverters, (4) settings determination, (5) deployment best practices, and, (6) Technical Policy 138, interconnection standard updates. This research produced the smart inverter policy that the Company has implemented for its Utah customers. That policy is currently being considered in a Utah Public Service Commission proceeding to determine how the value provided by customer smart inverters should be included in the Export Credit Rate. Utah Docket No. 17-035-61. A review and analysis of the smart inverter policy

implemented for the Company's Utah customers territory may provide valuable contributions towards developing a similar policy for its Idaho customers.

CUSTOMER COMMENTS AND NOTICE

Most customer comments received thus far are based on the Company's Original Application, including the Company letter sent to customers in June 2019.

That letter advised customers that:

- Existing customers would be transitioned to Schedule 136 over a ten-year period ending June 1, 2029,
- Compensation for exported energy would be reduced from 12.5 cents/kWh to 8.5 cents/kWh, and
- The typical payback period would increase from 9.6 years to 14.4 years.

Customer comments indicated that they disagreed with the Company's proposed changes and argued that the present compensation was less than described in the letter, creating a longer payback period than the stated 9.6 years. The customers believe that while it may be appropriate to set new export rates for new customers, the current customers are entitled to retain the current compensation program for the life of their systems. One customer stated that since the efficiency of a system is still 80% after 25 years, the existing customer should be kept on Schedule 135 for 25 years. Another customer suggested that customers should be compensated according to the charges under the Company's time-of-day charges for peak and off-peak power. Other customers said that the Company needs to consider the avoided energy cost and environmental benefits. Staff notes that these comments are similar to the comments expressed by Idaho Power net metering customers.

In addition, Staff notes that the Company's June 2019 letter to customers did not accurately characterize its proposed changes. The Company's original Application had two proposals regarding the new Export Credit Rate. The Company's primary recommendation was to grandfather existing net metering customers for ten years and change the compensation rate for new metering customers from the retail rate to 2.4 cents/kWh immediately. In the event that the Commission declined to grandfather existing customers, the Company proposed an alternative: transition all net metering customers from the retail rate for exports to the proposed

2.4 cents/kWh over three years. In the first year of the transition, customers would receive 8.5 cents/kWh for exported energy and would decrease significantly each of the next two years.

Neither the Company's June 2019 letter to customers nor its press release disclosed that the 8.5 cent/kWh credit would decline after the first year, nor did those communications disclose that the Company's primary proposal was a 2.4 cents/hour export credit for new customers. Applying a 2.4 cents/hour export credit rather than an 8.5 cents/hour credit rate significantly affects the payback period for these customer investments. Staff is deeply concerned that in its communications, the Company did not accurately represent its filing and its potential impact to affected customers.

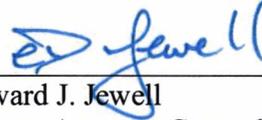
There has been only one customer comment received since the Company filed its Supplemental Application on April 23, 2020. That customer has been carrying a credit and would like a refund check from the Company.

Staff expects that more customers will comment on the Company's Supplemental Application when it is noticed by the Company and customer letters are distributed. Staff strongly recommends that the Company carefully examine the content and timing of those communications to ensure that they fully and accurately represent the Company's filing. Staff further recommends the Company ensure those communications are received with sufficient time and instructions for customers to participate in the Commission-ordered public workshops. Lastly, Staff recommends that the Company distribute notice of its Supplemental Application and public workshops broadly to all customers so that all interested customers – not just net metering customers—have the opportunity to be heard on this issue.

STAFF RECOMMENDATION

Staff recommends that the Company begin constructing its comprehensive net metering study and customer notice according to specifications laid out in more detail above.

Respectfully submitted this 26th day of May 2020.



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i:umisc/comments/pace19.8ejsdrfkmmjtch comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 26th DAY OF MAY 2020, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. PAC-E-19-08, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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